



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

October 8, 2020

BY ECF

The Honorable Paul G. Gardephe
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Alexei Saab*, 19 Cr. 676 (PGG)

Dear Judge Gardephe:

The Government writes to respectfully request a two-week adjournment of the deadline for the filing of the Government’s brief under Section 4 of the Classified Information Procedures Act (“CIPA”), which is currently due on October 15, 2020. The measures in place to address the COVID-19 pandemic have disrupted the operations necessary to complete the preparation of the requisite declarations accompanying the Government’s CIPA Section 4 motion in this case. More specifically, certain Government officials have not yet been able to obtain necessary clearances and review documents underlying the declarations in question, in part due to a reduced in-person work schedule brought on by the COVID-19 pandemic. In order to allow for the Government officials to complete these materials, the Government respectfully requests that the Court adjourn the deadline for the submission of its CIPA Section 4 brief until October 29, 2020.

Defense counsel consents to this request.

Respectfully submitted,

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cc: Defense Counsel (by ECF)